TETRA OIL COMPANY

GeoPlus Consulting Services
1400 Easton Drive – Suite 152
Bakersfield, CA 93309

Telephone (661) 327-1122
Fax (661) 327-2844

September 26, 2006

California Regional Water Quality Control Board
Central Valley Region
1685 E. Street
Fresno, CA 93706

Attn: Regional Water Board

Re: Tentative Cleanup and Abatement Order
Coffee Petroleum, Inc.
Coffee Lease
Round Mountain Oil Field
Kern County

Gentlemen:

On behalf of Coffee Petroleum, Inc. the following is my comments regarding the referenced order.

I, as a consultant to Coffee Petroleum, Inc., have been working with Coffee Petroleum, Inc. for the past several years to remedy their wastewater issues. The wastewater is a by-product of oilfield production. "The oilfield wastewater is a true addition to the hydrologic system, being drawn from deep, connate waters which are intermixed with oil deposits." (Kern County Water Agency Water Supply Report 1991, page 34).

The analytical results of the wastewater are 2,100 umhos/cm EC, 450 mg/L chloride and 1.2 mg boron. Although the wastewater concentration exceeds the Basin Plan values of 1,000 umhos/cm EC, 200 mg/L chloride and 1.0 mg boron, the water is within acceptable limits for some agriculture.

In addition to agriculture the produced water is very suitable for road dust control, water storage ponds for the use of fire control and enhancing the Poso Creek habitat.

Hundreds of trees have been grown with the produced water. A grove of eucalyptus, cotton wood and paulownia trees all have benefited from the use of the water. Regarding dust control it seems unnecessary to use groundwater for putting on the roads when good produced water is available. Wildfires are common in the foothills. The produced water satisfies the need for water storage reserved for the use of fire control. Appropriate storage tanks and open ponds are constructed in order to have water available at any time for the use of wildfire application. This water has been in the past, present and can in the future be supplied by the produced water.

Presently, authorized by the California Division of Oil, Gas and Geothermal Resources, an oil well is being converted to a wastewater injection well. Upon the completion of the requirements and successful implementation of the injection well all excess water, not going for the purpose of a beneficial use of agriculture, dust control, fire water and habitat, will be re-injected.

The quantity of discharge of the oil field water is insignificant to the impact of the groundwater recharge. Poso Creek's average annual flow is 9,000 acre-feet primarily in the months of March, April and May. Coffee Petroleum produces about 23 acre-feet of wastewater per year or less than ½ of 1% of the annual flow of Poso Creek. Upon the success of the injection well most of the wastewater will be re-injected.

The volume of Coffee Petroleum wastewater is insignificant compared to the volume of Poso Creek flow. There is no indication of significant groundwater degradation after 70 years of oil field operations as a result of oil field produced water discharge.

September 26, 2006
Regional Water Board
Coffee Petroleum, Inc.
Cleanup and Abatement Order

In a small way the wastewater from Coffee Petroleum's operation is a water resource. It is hoped that Coffee Petroleum would be able to continue the beneficial use of the produced water for tree farming, dust control, fire water and habitat.

Thank you for your time for reviewing our comments to the order.

Respectfully submitted,

Thomas W. Ladd
California Professional Geologist # 3568

Cc: Coffee Petroleum, Inc.